

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ROBERT D. REDSTON 1998 TRUST; DAVID
ISELIN, individually and in his capacity as Trustee
for the Robert D. Redston 1998 Trust; AUDREY
ISELIN; and TERESA COHEN,

Defendants.

Adv. Pro. No. 10-04738 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including March 31, 2015.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

[The remainder of this page is intentionally left blank.]

Dated: March 2, 2015
New York, New York

By: /s/ Nicholas J. Cremona
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Marc E. Hirschfield
Email: mhirschfield@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Estate of Bernard L. Madoff*

Dated: March 2, 2015
New York, NY

By: /s/ Jeffrey L. Bernfeld
**BERNFELD, DEMATTEO
& BERNFELD, LLP**
600 Third Avenue, 15th Floor
New York, New York 10016
Telephone: (212) 661-1661
Facsimile: (212) 557-9610
Jeffrey L. Bernfeld
Email: jeffreybernfeld@bernfeld-dematteo.com

*Attorneys for Defendants Robert D. Redston 1998
Trust; David Iselin, individually and in his capacity
as Trustee for the Robert D. Redston 1998 Trust;
Audrey Iselin; and Teresa Cohen*

Dated: March 2, 2015
New York, NY

By: /s/ Ira L. Herman
Ira L. Herman, Mediator